

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	No. 3:20-CR-621-K-1
	§	<b>Judge Kinkeade</b>
	§	
<b>SHERMAN ROBERTS,</b>	§	
<b>Defendant.</b>	§	

**AGREED MOTION TO CONTINUE TRIAL**

COMES NOW, Sherman Roberts, defendant, by and through the undersigned counsel, and respectfully requests that the trial in this cause be continued, and for good cause shows as follows:

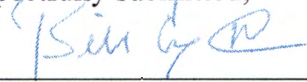
**The Grounds for the Requested Continuance**

1. Defendant asks the Court to continue the current trial date of May 20, 2024 and all associated pre-trial deadlines. The current Scheduling Order was issued on October 5, 2023 regarding the current trial schedule. (Dkt.#28)
2. Counsel and the Government believe it is appropriate to grant this continuance. Defendant is currently on pre-trial release. Counsel and the Government believe it is best to resolve this case as a non-jury trial. However, Counsel and defendant will continue to work to find a resolution for this case. Counsel respectfully requests a continuance from the current trial setting and move to a non-jury trial, trial before the Court setting.

**Conclusion**

3. The Speedy Trial Act, 18 U.S.C. §§ 3161 provides that a continuance may be granted based on the Court's "findings that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. §3161(h)(7)(A).
4. In consideration of defendant's rights to both due process and the effective assistance of counsel - as well as the precepts of the Speedy Trial Act - counsel respectfully requests a trial date on or after October 14, 2024 and an Amended Pretrial Order.

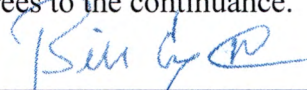
Respectfully submitted,



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**CERTIFICATE OF CONFERENCE**

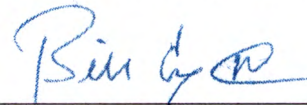
I certify that I have conferred with counsel for the Government, AUSA Donna Max on April 22, 2024, regarding defendant's motion and she agrees to the continuance.



William D. Cox III

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2024, the following document was filed electronically, using the ECF system for the Northern District of Texas, Dallas Division, and that a copy of this document will be provided electronically to all parties.



William D. Cox III